

REMARKS

Applicants respectfully request favorable reconsideration of this application.

Claims 7, 8, 10-12, 14, and 18-22 are pending.

In the Office Action, Claims 7-8, 10-12, 14, and 18-22 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,751,667 to Ilnicki ("*Ilnicki*") in view of U.S. Patent No. 6,981,265 to Rees ("*Rees*"). Claims 7-8, 10-12, 14, and 18-22 were also rejected under 35 U.S.C. § 112 (first paragraph).

In the Office Action, Claims 7-8, 10-12, 14, and 18-22 were rejected under 35 U.S.C. § 112 (first paragraph), for allegedly containing subject matter which was not described in the specification in such a way as to enable one skilled in the art to which it pertains, to make and/or use the invention. More specifically, the Office Action alleges at pages 2-3 that since the specification discloses that a "message" is first received and redirected by the gateway before it is received at the server machine, the specification also allegedly does not provide sufficient written support for the idea that a first "request" addressed to the server application is ever received at the server machine before being rerouted to the gateway. Applicants respectfully disagree.

Independent Claims 7 and 14, recite that a "request" from the client network is received at a first port of a server application to establish a first connection with the server application. Whether or not a "message" is received at the first port of the server machine before it is rerouted to a gateway machine does not determine whether a "request" to establish a connection is received at that port. Additionally, Applicants' disclosure clearly discloses at page 2, lines 12-20, for example, the establishing of a "direct" connection between a client network and the first port of a server application hosted in a server machine. Also, the specification also clearly states that the "direct" connection between the client network and the server machine

is established so that “messages” can later be sent between the client network and the server machine through a network layer of a gateway machine (page 2, lines 12-20).

Therefore, Applicants respectfully submit that the specification clearly discloses that a request to establish a first connection at a first security level is directly received at the server machine. Withdrawal of the rejection is therefore respectfully requested.

Turning to the rejections under 35 U.S.C. § 103(a), Claim 7 recites, *inter alia*, receiving a request from the client network at a first port of a server application hosted in the server machine to establish a first connection at a first security level with the first port of the server application.

It is apparent that the applied references do not teach or suggest at least the above feature of Claim 7.

For example, Ilnicki fails to teach or suggest receiving a request from the client network at a first port of a server application hosted in the server machine to establish a connection at a first security level with a first port of the server application, as recited in Claim 7. In particular, the Office Action relies on Col. 5, lines 21-25 and Col. 8, lines 46-57 as allegedly disclosing “receiving a request from the client network at a first port of a server application hosted in the server machine to establish a first connection at a first security level with the first port of the server application.” However, the cited portion of Ilnicki fails to disclose receiving a request from the client network at a first port of a server application hosted in the server machine. The cited portion of Ilnicki describes the connection established between the client network and the server machine through a gateway 33. There is no teaching or suggestion in Ilnicki of a server machine receiving a request from the client network

at a first port of the server application hosted in the server machine, as recited in Claim 7.

Secondary reference Rees, for its part, is not seen to remedy the above-discussed deficiencies of Ilnicki, nor does the Office Action rely on Rees for such a teaching.

Therefore, Applicants respectfully submit that Claim 7 distinguishes patentably from Ilnicki and Rees whether taken alone or in combination.

Claim 14 also recites, *inter alia*, receiving a request from the client network at a first port of a server application hosted in the server machine to establish a first connection at a first security level with a first port of the server application.

Therefore, Applicants respectfully submit that independent Claim 14 distinguishes patentably from the applied references for at least the reasons discussed above with respect to Claim 7.

The remaining claims are also believed to be patentable due to their respective dependence from independent Claims 7 and 14, as well as for the additional features recited in the remaining claims.

In view of the foregoing, Applicants respectfully submit that this application is in condition for allowance. A Notice of Allowance is respectfully requested.

The Commissioner is hereby authorized to charge to Deposit Account No. 50-1165 (T2147-907461) any fees under 37 C.F.R. §§ 1.16 and 1.17 that may be required

by this paper and to credit any overpayment to that Account. If any extension of time is required in connection with the filing of this paper and has not been separately requested, such extension is hereby requested.

Respectfully submitted,

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